

Robert T. Szyba  
SEYFARTH SHAW LLP  
620 Eighth Avenue  
New York, New York 10018  
(212) 218-5500

*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

JOHN MOSES,

Plaintiff,

v.

WAYFAIR LLC., DIRECTOR DAN  
HUDSON, TALENT MANAGER: MAX  
UNIMAN, HUMAN RESOURCE  
MANAGER: SHELLIE WEBER, HUMAN  
RESOURCE REP.: LINDA, 1st Shift  
RECEIVING SUPERVISOR: TOM, 2nd Shift  
RECEIVING SUPERVISOR: LUIS  
RODIGUEZ, 2nd Shift RECEIVING  
SUPERVISOR: CHRISTOPHER KEATS, 2nd  
SHIFT BULK MANAGER: GERROD  
SMITH, 2nd SHIFT BULK MANAGER:  
DONALD LOVILL, ALL OTHER JOHN  
DOES -100,

Defendants.

Civil Action No. 3:20-cv-05278-MAS-DEA

**[PROPOSED] ORDER**

This matter having come before the Court by cross-motion of Seyfarth Shaw LLP, attorneys for Defendants Wayfair LLC, Dan Hudson, Max Uniman, Shellie Weber, Linda Herzstein, Tom Mitchell, Luis Rodriguez, Christopher Keats, Gerrod Smith, and Donald Lovill (collectively, “Defendants”), seeking an Order awarding to Defendants attorneys’ fees and costs incurred in defending Plaintiff’s discovery motions filed on November 28, 2022 and January 4, 2023, and such other and further relief as the Court may deem just and proper.

IT IS HEREBY ORDERED that Defendants' cross-motion is granted in its entirety, and that Defendants shall have 21 days from the date of this Order to submit a schedule of fees and costs.

SO ORDERED this \_\_\_\_ day of \_\_\_\_, 2023.

---

Hon. Michael A. Shipp, U.S.D.J.